CLOSURE PLAN

FOR

FORMER HAZARDOUS WASTE CONTAINER STORAGE AREAS

Prepared for

GENERAL ELECTRIC DISTRIBUTION AND CONTROL
GENERAL ELECTRIC COMPANY
WEST BURLINGTON, IOWA

Project No. 3286.0020

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Prepared by

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I hereby certify that this engineering document was prepared by me or under my direct personal supervision and that I am a duly Registered Professional Engineer under the laws of the State of Iowa.

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Date: 9-1-94 **Reg. No.** 11975

My registration expires December 31, 1995.

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GENERAL INFORMATION

OBJECTIVE

General Electric Company (GE) has a distribution and control facility which manufactures switchgear equipment. The facility is located at 510 East Agency Road, West Burlington, Iowa (shown in Figure 1-1). Wastes generated at this facility result from electroplating, degreasing and painting operations conducted at the site.

Under paragraph 12(a) of the Consent Agreement and Consent Order executed by GE and the U.S. Environmental Protection Agency (EPA), Region VII (Docket No. VII-93-H-0014, effective August 6, 1994), GE is required to submit a Closure Plan for the "Big" Hazardous Materials Storage Building ("Big" Building) which meets the standards of 40 CFR Part 265, Subpart G. The EPA has also requested that a Closure Plan be submitted for two additional storage areas which were the subject of RCRA Part B documentation. The two additional areas, an Outdoor Storage Rack Area and Safety Building, are under Interim Status.

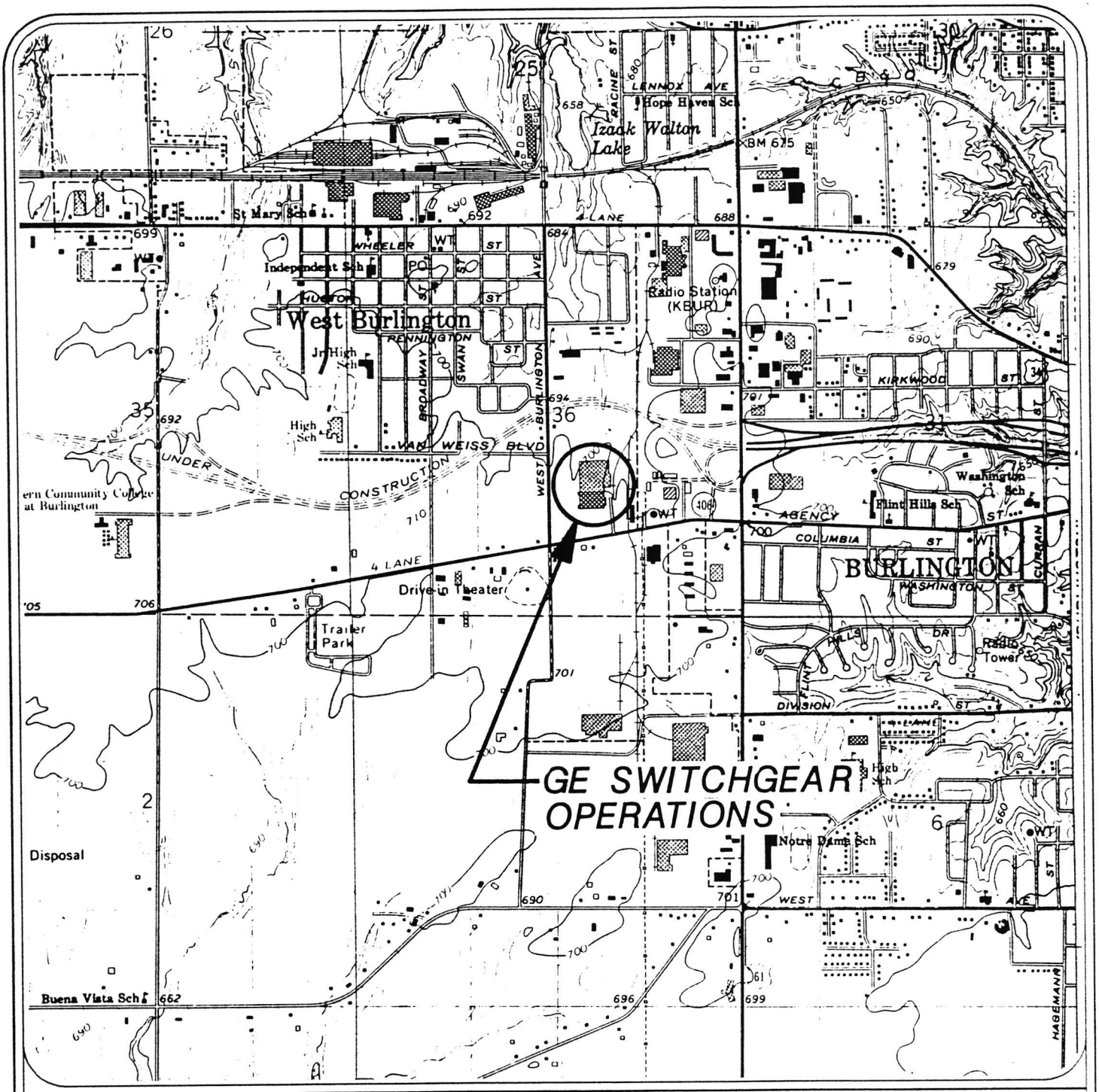
The purpose of this document is to serve as a Closure Plan for the "Big" Building, the Outdoor Storage Rack Area and Safety Building referenced in the RCRA Part B documentation.

WASTE CHARACTERISTICS

Hazardous wastes that have been managed in the container storage areas are summarized in Table 1-1. The primary constituents of the wastes are also included in Table 1-1 to minimize sample analysis activities.

EXISTING CONDITIONS

The original storage system, used until 1989, consisted of a series of metal storage racks. Drip pans and saddles were located under the racks to contain spillage and precipitation. The pans were occasionally emptied and the contents containerized and manifested for off-site disposal. According to company records, the pans neither overflowed nor allowed potentially hazardous waste or precipitation to come in contact with the underlying concrete surface. Under the original RCRA Part A documentation, the hazardous waste storage area had the capacity for 44, 55-gallon drums. The Part A documentation was revised in 1982 to increase the storage capacity to one hundred, 55-gallon drums. In 1989, a specially designed Safety Building (constructed of steel and moveable), with secondary containment, was placed adjacent to the Outdoor Storage Rack Area. The Safety Building was used as an accumulation area where hazardous waste would be stored for no longer than 90 days. Once use of the Safety Building was implemented, Part A documentation was revised, and Part B documentation was written as the storage capacity decreased to 24, 55-gallon drums. At this time, the "Big" Building also became a part of the hazardous waste storage system. Figure 1-2 illustrates the size and location of the former storage areas.



MAP SOURCE: U.S.G.S. TOPOGRAPHIC QUADRANGLES. WEST BURLINGTON, IOWA.

SITE LOCATION: SEC. 36, T. 70N., R. 3W., DES MOINES COUNTY.

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SCALE IN FEET

GENERAL ELECTRIC COMPANY
GE SWITCHGEAR OPERATION
WEST BURLINGTON, IOWA

MONTGOMERY WATSON

SITE LOCATION MAP

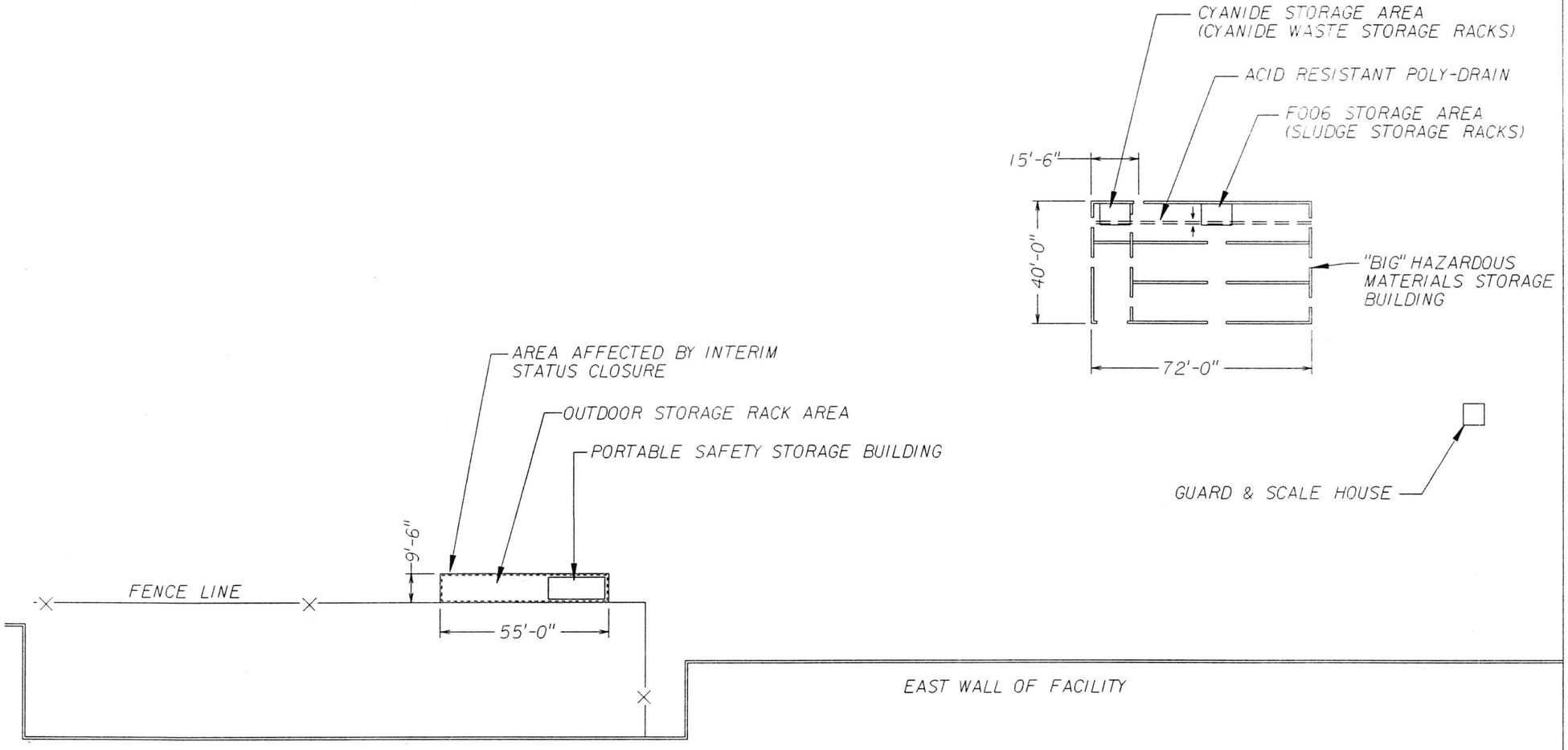
FIGURE 1-1

TABLE 1-1

WASTE CHARACTERISTICS

Waste Managed	Waste Constituents	40 CFR 261 Waste Code
"Big" Building		
• Silver Cyanide Bath, Sludge, Solids, Noncyanide Silver Bath	Cyanide, Silver	F006, F007, F008, D011
Outdoor Storage Rack Area		
• Paint Sludge, Filters	NA	D001
• Dry Booth Filters, Sludge, Masking, Thinners	Lead, Xylenes, Ethylbenzene, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Toluene	D001, D008, F003, F005
• Spent Degreasing Solvent	1,1,1-Trichloroethane	F001
• Spent Freon Solvent	1,1,2-Trichloro-1,2,2-Trifluoroethane	F002
Safety Building		
• Paint Sludge, Filters	NA	D001
• Dry Booth Filters, Sludge, Masking, Thinners	Lead, Xylenes, Ethylbenzene, Methyl Ethyl Ketone, Methyl Isobutyl Ketone, Toluene	D001, D008, F003, F005
• Silver Cyanide Bath, Sludge, Solids, Noncyanide Silver Bath	Cyanide, Silver	F006, F007, F008, D011

NA = Not Applicable



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SCALE IN FEET

GENERAL ELECTRIC COMPANY
GE SWITCHGEAR OPERATION
WEST BURLINGTON, IOWA

SITE PLAN

FIGURE 1–2

MONTGOMERY WATSON

VBT

The "Big" Building is currently used to house hazardous waste. The concrete floor is in good condition, and there is no physical evidence to indicate any release of waste has occurred. Wastes currently stored in the "Big" Building are managed off site at Clean Harbors in Chicago, Illinois, with the exception of cyanide wastes which are recycled by RFE and Cyanochem, and electroplating sludge which is recycled by Encycle.

Currently, there is no physical evidence to indicated any release of waste has occurred. Since 1989, the original Outdoor Storage Rack Area has not been used to store hazardous waste containers, and the concrete pad located underneath the storage racks is in good condition. The Safety Building and Outdoor Storage Rack Area, subject of the RCRA Part B Application, have been under Interim Status, and no waste is currently being stored in the building. Wastes formerly stored in these areas were managed off site at Clean Harbors in Chicago, Illinois, with the exception of cyanide wastes which were recycled by RFE and Cyanochem, and electroplating sludge which was recycled by Encycle.

MAXIMUM WASTE INVENTORY

The maximum waste volume in storage at any one time during the lifetime of the container storage areas was one hundred, 55-gallon drums. However, the wastes have been routinely removed and disposed. The accumulation of waste is being managed well below the maximum waste volume.

CLOSURE PLAN REQUIREMENTS

This Closure Plan provides for closure of the "Big" Building, referenced in the aforementioned Consent Order, and the Outdoor Storage Rack Area and Safety Building, referenced in Part B documentation. The Closure Plan is submitted in accordance with applicable requirements of 40 CFR 265, Subpart G. The closure performance standards set forth in 40 CFR 265.111 require that the container storage areas be closed in a manner that:

a. Minimizes the need for further maintenance.

b. Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere.

This document will serve as GE's Closure Plan for the designated areas in accordance with 40 CFR 265.112. Following approval of this Closure Plan, GE will maintain a copy of the approved Closure Plan, including revisions and amendments thereto, at the West Burlington, Iowa facility until certification of closure has been submitted to and accepted by the EPA Region VII. Upon completion of closure, GE will submit to the Regional Administrator a certificate signed by its designated representatives and a Professional Engineer registered in the state of Iowa, certifying that the areas have been closed in accordance with the specifications in the approved Closure Plan, as required by 40 CFR 265.115.

SECTION 2

CLOSURE ACTIVITIES FOR THE "BIG" BUILDING

This section will present a detailed description of closure activities for the container storage areas including decontamination of the concrete surfaces.

HAZARDOUS WASTE SHIPMENT AND DISPOSAL

Wastes currently housed in the "Big" Building are managed off site at Clean Harbors in Chicago, Illinois, with the exception of cyanide wastes which are recycled by RFE or Cyanochem, and electroplating sludge which is recycled by Encycle. The on-going disposal of waste will not be accounted for in the estimated closure costs.

EQUIPMENT REQUIRED FOR CLOSURE

Limited equipment will be needed to complete closure in accordance with this Closure Plan. A list of the equipment necessary to complete closure activities is presented in Table 2-1. Provision of equipment will be determined by GE or their representative.

"BIG" BUILDING DECONTAMINATION AND SAMPLE COLLECTION

Container Storage Area Decontamination

There are two storage rack areas to be decontaminated within the "Big" Building. The storage racks are stacked two levels high, and each of the two areas cover approximately 16 feet by 7 feet. The storage rack areas are used to hold electroplating sludge and cyanide electroplating wastes, respectively. The same procedure will be followed in decontaminating both storage rack areas within the "Big" Building.

The concrete floor underneath the storage racks will be swept thoroughly to remove any loose debris. The floor sweepings will be collected and placed in containers used for off-site disposal as hazardous waste. Floor sweepings will not be analyzed for constituents listed in this Closure Plan.

The storage racks and underlying concrete surface will be thoroughly washed with a high-pressure power washer and a nonfoaming detergent such as Alcojet®. Water generated from the initial decontamination (with detergent) will be immediately vacuum collected from the racks and underlying concrete surface (to eliminate runoff onto adjacent areas) and transferred into clean 55-gallon drums labeled "Sludge Storage-Decontamination Water" or "Cyanide Storage-Decontamination Water," as appropriate. The storage racks and underlying concrete will then be thoroughly rinsed with the power washer without detergent. The rinse water will also be immediately vacuum collected, transferred into clean 55-gallon drums and labeled "Sludge Storage-Rinse Water" or "Cyanide Storage-Rinse Water," as appropriate.

The interior of the vacuum will also be flushed with water between collection of decontamination and rinse waters and after use. This water will be containerized with the decontamination waters.

TABLE 2-1

EQUIPMENT REQUIRED FOR CLOSURE OF THE "BIG" BUILDING

Quantity	Item	Use
12	55-Gallon Drum	Storage of Decontamination and Rinse Waters
1	Power Washer	Decontaminate Area
1	Wet Shop Vacuum	Collect Decontamination and Rinse Waters
1	Squeegee	Cleanup Excess Rinse Water
1	Stock Tank or Poly Tank	Collect Decontamination and Rinse Waters
As Required	Miscellaneous Equipment, Detergents, Rubber Gloves, Sample Containers, Boots	Closure and Decontamination Activities

Drip Pan and Saddle Storage Area Decontamination

Drip pans and saddles, formerly used as secondary containment underneath the storage racks at the facility, are currently stored in the "Big" Building. The drip pans and saddles will be relocated temporarily to the Outdoor Storage Rack Area for decontamination. The drip pans and saddles will be thoroughly washed with a high pressure power washer and a nonfoaming detergent such as Alcojet®. Washing will be conducted over a larger container (i.e., stock tank or poly tank) to collect the decontamination and rinse waters. Water generated from the initial decontamination (with detergent) will be vacuum collected and transferred into clean 55-gallon drums labeled "Drip Pans-Decontamination Water." The drip pans and saddles will then be thoroughly rinsed with the power washer without detergent. The rinse water will also be collected and transferred into clean 55-gallon drums labeled "Drip Pans-Rinse Water."

The concrete surface located in the "Big" Building where the drip pans and saddles had been stored will be swept thoroughly to remove any loose debris. The floor sweepings will be collected and placed in containers used for off-site disposal as hazardous wastes. The concrete surface then will be washed with a high-pressure power washer and a nonfoaming detergent such as Alcojet®. Water generated from the initial decontamination (with detergent) will be vacuum collected and transferred into clean 55-gallon drums labeled "'Big' Building-Decontamination Water." The concrete surface will then be thoroughly rinsed with the power washer without detergent. The rinse water will also be immediately vacuum collected and transferred into clean 55-gallon drums labeled "'Big' Building-Rinse Water." The decontaminated drip pans and saddles will then be returned to their original storage location within the "Big" Building.

Sampling of Decontamination and Rinse Water

Upon completion of decontamination activities, the decontamination and rinse waters will be sampled by lowering a clean Teflon™ bailer directly into a drum. Separate bailers will be used when sampling the decontamination and rinse water drums. The decontamination water sample will be collected from the first drum generated during the area's decontamination. This should facilitate collection of a sample which is most representative of contaminants which were removed from the surface. The rinse water sample will be collected from the last drum generated during the rinsing process. This sample should be indicative of the extent to which the area was cleaned. Upon collection, the samples will be transferred into appropriately marked sample containers and placed in coolers with cold packs. Disposable gloves will be worn during sampling and will be changed prior to collection of each subsequent sample.

Upon collection of samples, the drums of water generated during decontamination activities will be dated, sealed and transferred to a temporary storage area within the GE facility. The drums will be held pending receipt of decontamination and rinse water sample analytical results. Appropriate accumulation times for the decontamination and rinse waters will not be exceeded. The following criteria will be used to establish the appropriate disposal method for the water and to determine whether additional decontamination of the "Big" Building container storage area and drip pans is needed:

- If the decontamination or rinse waters exhibit contaminant concentrations equal to or exceeding target cleanup levels established in Section 4, the decontamination

and rinse waters will be discharged to the on-site wastewater pretreatment system in a manner consistent with state and federal regulations.

- If the rinse water exhibits contaminant concentrations equal to or in excess of the cleanup target levels established in Section 4, the two-step decontamination of the corresponding area will be repeated until analytical results of the rinse water exhibit contaminant concentrations below the cleanup target levels.

- If the rinse water exhibits contaminant concentrations below the cleanup target levels, the water will be discharged to the sanitary sewer in a manner consistent with state and federal regulations, and no further decontamination of the area will be conducted.

SECTION 3

CLOSURE ACTIVITIES FOR THE OUTDOOR STORAGE RACK AREA AND SAFETY BUILDING

This section will present a detailed description of closure activities for the container storage areas including decontamination of the concrete surfaces.

HAZARDOUS WASTE SHIPMENT AND DISPOSAL

No hazardous materials have been stored in the Outdoor Storage Rack Area since 1989. The Safety Building and Outdoor Storage Rack Area, subject of the RCRA Part B Application, are under Interim Status, and no waste is currently being stored in these container storage areas. Wastes formerly stored in these areas were managed off site at Clean Harbors in Chicago, Illinois, with the exception of cyanide wastes which were recycled by RFE and Cyanochem, and electroplating sludge which was recycled by Encycle.

EQUIPMENT REQUIRED FOR CLOSURE

Limited equipment will be needed to complete closure in accordance with this Closure Plan. A list of the required equipment is presented in Table 3-1. Provision of equipment will be determined by GE or their representative.

CONTAINER STORAGE AREA DECONTAMINATION AND SAMPLE COLLECTION

The outdoor storage racks are stacked two levels high and cover an area approximately 35 feet by 10 feet. The adjacent Safety Building (constructed of steel and moveable) has dimensions of approximately 20 feet by 10 feet and is empty at this time.

Outdoor Storage Rack Area

The concrete floor underneath the storage racks will be swept thoroughly to remove any loose debris. The floor sweepings will be collected and placed in containers used for disposal as hazardous waste. The storage racks and underlying concrete surface will be thoroughly washed with a high-pressure power washer and a nonfoaming detergent such as Alcojet®. Water generated from the initial decontamination (with detergent) will be immediately vacuum collected from the racks and underlying concrete surface (to eliminate runoff onto adjacent areas) and transferred into clean 55-gallon drums labeled "Outdoor Storage Rack Area-Decontamination Water." The storage racks and underlying concrete surface will then be thoroughly rinsed with the power washer without detergent. The rinse water will also be immediately vacuum collected, transferred into clean 55-gallon drums and labeled "Outdoor Storage Rack Area-Rinse Water."

Safety Building

The floor of the Safety Building will be swept thoroughly to remove any loose debris. The floor sweepings will be collected and placed in containers used for disposal as hazardous waste. Floor sweepings will not be analyzed for constituents listed in this Closure Plan.

TABLE 3-1

EQUIPMENT REQUIRED FOR CLOSURE OF OUTDOOR STORAGE RACK AREA AND SAFETY BUILDING

Quantity	Item	Use
6	55-Gallon Drum	Storage of Decontamination and Rinse Waters
1	Power Washer	Decontaminate Area
1	Wet Shop Vacuum	Collect Decontamination and Rinse Waters
1	Squeegee	Cleanup Excess Rinse Water
As Required	Miscellaneous Equipment, Detergents, Rubber Gloves, Sample Containers, Boots	Closure and Decontamination Activities

The interior walls and floor in the Safety Building will be thoroughly washed with a high-pressure power washer and a nonfoaming detergent such as Alcojet®. Water generated from the initial decontamination (with detergent) will be vacuum collected and transferred into clean 55-gallon drums labeled "Safety Building-Decontamination Water." The interior walls and floor will then be thoroughly rinsed with the power washer without detergent. The rinse water will also be vacuum collected and transferred into clean 55-gallon drums labeled "Safety Building-Rinse Water."

Sampling of Decontamination and Rinse Waters

Upon completion of decontamination activities, the decontamination and rinse waters will be sampled by lowering a clean Teflon™ bailer directly into a drum. Separate bailers will be used when sampling the decontamination and rinse water drums. The decontamination water sample will be collected from the first drum generated during the area's decontamination. This should facilitate collection of a sample which is most representative of contaminants which were removed from the surface. The rinse water sample will be collected from the last drum generated during the rinsing process. This sample should be indicative of the extent to which the area was cleaned. Upon collection, the samples will be transferred into appropriately marked sample containers and placed in coolers with cold packs. Disposable gloves will be worn during sampling and will be changed prior to collection of each subsequent sample.

Upon collection of samples, the drums of water generated during decontamination activities will be dated, sealed and transferred to a temporary storage area within the GE facility. The drums will be held pending receipt of decontamination and rinse water sample analytical results. Appropriate accumulation times for the decontamination and rinse waters will not be exceeded. The following criteria will be used to establish the appropriate disposal method for the water and to determine whether additional decontamination of the Outdoor Storage Rack Area and Safety Building is needed:

- If the decontamination or rinse waters exhibit contaminant concentrations equal to or exceeding target cleanup levels established in Section 4, the decontamination and rinse waters will be discharged to the on-site wastewater pretreatment system in a manner consistent with state and federal regulations.

- If the rinse water exhibits contaminant concentrations equal to or in excess of the cleanup target levels established in Section 4, the two-step decontamination of the corresponding unit will be repeated until analytical results of the rinse water exhibit contaminant concentrations below the cleanup target levels.

- If the rinse water exhibits contaminant concentrations below the cleanup target levels, the water will be discharged to the sanitary sewer in a manner consistent with state and federal regulations, and no further decontamination of the unit will be conducted.

SECTION 4

FIELD SAMPLING AND LABORATORY PROTOCOL

This section will present a discussion of the performance standards, sample handling and analysis protocol to be followed during closure of the former on-site hazardous waste container storage areas at the GE facility.

PERFORMANCE STANDARDS

This Closure Plan is designed to meet the performance standards as defined in 40 CFR 265.111 (i.e., to minimize the need for future maintenance of the former storage areas and to minimize or eliminate the release of hazardous waste constituents to the atmosphere, ground and surface waters). Specific levels of cleanup for these areas are identified in the "Cleanup Target Levels" part of this section.

HAND SAMPLING EQUIPMENT DECONTAMINATION

Hand sampling equipment (bailer, etc.), used for collection of water samples, will be decontaminated before use and prior to collection of each subsequent sample. The equipment will be thoroughly hand washed with water and a nonphosphate detergent such as Alconox® and then rinsed with distilled water. Water generated during the sampling equipment decontamination will be combined with the "decontamination water" (water with detergent) generated during the decontamination of each former hazardous waste container storage area. Handling procedures for the water will be based on analytical results from the decontamination water from the concrete surface of each area.

QUALITY ASSURANCE/QUALITY CONTROL SAMPLE COLLECTION

In order to verify the validity of samples collected, duplicate quality assurance/quality control (QA/QC) samples and equipment blanks will also be collected. Duplicate water samples and equipment blanks will be collected at a frequency of ten percent (i.e., one duplicate for every ten water samples). The duplicate water samples will be labeled as from a different water sample location. The actual identity of the duplicate will be logged in a bound field book at the time of sample collection.

In addition to the duplicate samples and equipment blanks collected in the field, the laboratory analyzes matrix spikes, matrix spike duplicates, etc., as part of normal quality assurance procedures. A discussion of all QA/QC data and how it reflects on the validity of analytical results for closure samples will be presented in the Closure Certification document.

SAMPLE PREPARATION AND SHIPMENT

Decontamination and rinse water samples will be placed directly into laboratory-supplied containers. Table 4-1 provides a summary of the types of sample containers and preservation

TABLE 4-1

ANALYTICAL SUMMARY

Parameter	EPA Method	MDL	Container	Preservative	Maximum Holding Time[a]
Metals					
Lead	7421	0.005 mg/L	500 ml Plastic	HNO_3	180 Days
Cyanide	9010	0.007 mg/L	1,000 ml Plastic	NaOH	14 Days
Silver	6010	0.03 mg/L	500 ml Plastic	HNO_3	180 Days
Cadmium	7131	0.001 mg/L	500 ml Plastic	HNO_3	180 Days
Chromium	6010	0.03 mg/L	500 ml Plastic	HNO_3	180 Days
Volatiles					
Volatile Organics	8260	[b]	Three, 40 ml Glass Vials	4°C, HCl	14 Days

[a] Holding duration is from time of collection for all methods.

[b] Method Detection Limits (MDLs) for volatile organics are as follows: toluene (1.0 µg/L); ethylbenzene (1.0 µg/L); xylenes (1.0 µg/L); 1,1,1-trichloroethane (1.0 µg/L); 1,1,2-trichloro-1,2,2-trifluoroethane (1.0 µg/L); methyl ethyl ketone (5 µg/L); and methyl isobutyl ketone (5 µg/L).

EPA = Environmental Protection Agency
ml = milliliter

which will be used for the rinse water samples. Each sample container will be labeled with the following information:

- Site Location
- Sample Identity
- Date
- Time of Collection
- Sampler's Initials

Immediately upon sample collection, the sample container(s) will be placed in cooler(s) with cold packs. Upon completion of daily closure activities, the coolers(s) will be secured for proper handling and shipped by overnight service to the laboratory for analysis. Chain of custody and sample analysis request forms will accompany all samples during shipment. Completed chain of custody and sample analysis request forms will be presented in the required Closure Certification. Blank copies of the forms are presented in Appendix A.

SAMPLE ANALYSIS

Based upon the nature of the contaminants contained in the storage areas, the following hazardous constituents will be measured for total analysis:

Samples from the sludge storage racks in the "Big" Building will be analyzed for total:

- Lead
- Cyanide
- Silver
- Cadmium
- Chromium
- Xylenes
- Ethylbenzene
- Methyl Ethyl Ketone
- Methyl Isobutyl Ketone
- Toluene

Samples from the cyanide storage racks in the "Big" Building will be analyzed for total:

- Lead
- Cyanide
- Silver
- Cadmium
- Chromium

Samples from both the drip pan and saddle storage areas in the "Big" Building will be analyzed for total:

- Lead
- Cyanide
- Silver
- Cadmium
- Chromium
- Xylenes
- Ethylbenzene
- Methyl Ethyl Ketone
- Methyl Isobutyl Ketone
- Toluene
- 1,1,1-Trichloroethane
- 1,1,2-Trichloro-1,2,2-Trifluoroethane

Samples from the Outdoor Storage Rack Area will be analyzed for total:

- Lead
- Cyanide
- Silver
- Cadmium
- Chromium
- Xylenes
- Benzene
- Ethylbenzene
- Methyl Isobutyl Ketone
- Toluene
- 1,1,1-Trichloroethane
- 1,1,2-Trichloro-1,2,2-Trifluoroethane

Samples from the Safety Building will be analyzed for total:

- Lead
- Cyanide
- Silver
- Cadmium
- Chromium
- Benzene
- Xylenes
- Ethylbenzene
- Methyl Ethyl Ketone
- Methyl Isobutyl Ketone
- Toluene
- 1,1,1-Trichloroethane
- 1,1,2-Trichloro-1,2,2-Trifluoroethane

These compounds are selected as the hazardous constituents present at the site by which the success of the clean closure can be measured. Table 4-1 presents a summary of the analytical methods and reporting limits which will be utilized for analysis of samples. All applicable analytical methods, QA/QC procedures and chain of custody protocols will be in accordance with EPA Publication SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods."

LABORATORY QUALITY ASSURANCE/QUALITY CONTROL

All samples collected during closure activities will be analyzed using EPA-approved methods as outlined in the latest version of EPA Manual SW-846 (see Table 4-1). All analyses will be conducted in accordance with the laboratory's QA/QC plan to ensure the accuracy of reported results. Quality assurance data, including analytical spikes and duplicates, will be provided with the reported results.

CLEANUP TARGET LEVELS

The cleanup target levels for the water generated during closure activities originate from health-based standards developed for a specific constituent. The target levels are based on an assumed ingestion rate of 2 liters/day for a 70-year period (70 kg adult) and RfDs for carcinogens and systemic toxicants. If an RfD-based target level was not available, the maximum contaminant level (MCL) or other appropriate health-based criteria for the constituent was used for the cleanup target level. Unless otherwise indicated, all target levels and MCLs were taken from the July 27, 1990 Federal Register, Appendices A and B. The following is a discussion of the selection of each target level:

- Lead: The target level for lead is 0.05 mg/L. An MCL for lead is not available. The target level of 0.05 mg/L is the former MCL.

- Cyanide: The target level of 0.7 mg/L is based on a systemic RfD for cyanide in water.

- Silver: The target level of 0.02 mg/L is the drinking water equivalent level for silver. An MCL for silver is not available.

- Cadmium: The target level of .01 mg/L is the MCL for cadmium.

- Chromium, Total: The target level of .10 mg/L is the MCL for chromium. This target level was taken from 40 CFR 141.62.

- Xylenes: The target level of 70 mg/L is based on a systemic RfD for xylene in water.

- Ethylbenzene: The target level of 4 mg/L is based on a systemic RfD for ethylbenzene in water.

- Methyl Ethyl Ketone: The target level of 2 mg/L is based on a systemic RfD for methyl ethyl ketone in water.

- Methyl Isobutyl Ketone: The target level of 2 mg/L is based on a systemic RfD for methyl isobutyl ketone in water.

- Toluene: The target level of 10 mg/L is based on a systemic RfD for toluene in water.

- 1,1,1-Trichloroethane: The target level of 0.2 mg/L is the MCL for 1,1,1-trichloroethane.

- 1,1,2-Trichloro-1,2,2-Trifluoroethane: The target level of 1 µg/L is the method reporting limit for 1,1,2-trichloro-1,2,2-trifluoroethane in water. A health-based standard for 1,1,2-trichloro-1,2,2-trifluoroethane in water has not been established.

- Benzene: The target level of 0.005 mg/L is the MCL for benzene.

SECTION 5

CLOSURE SCHEDULE, COST ESTIMATE AND ASSOCIATED REQUIREMENTS

This chapter will summarize the closure schedule, cost estimate and associated requirements for the closure of the former hazardous waste container storage areas.

CLOSURE SCHEDULE

It is anticipated that on-site closure activities will commence within 30 days following receipt of the EPA Region VII's approval of this Closure Plan. Closure activities will not proceed during inclement weather or winter weather conditions. The proposed schedule of activities is presented in Table 5-1. It has been the EPA Region VII's policy to require that a facility notify the EPA Region VII 30 days in advance of conducting closure activities to allow EPA personnel to be present on site. Therefore, GE or their representative will notify the EPA Region VII of intended closure activities.

The specific dates for closure activities are unknown but will follow the schedule outlined in Table 5-1. Closure will be completed within 180 days following commencement of the Closure Schedule. A Closure Certification will be submitted to EPA Region VII within 60 days of the completion of closure activities. It is anticipated that closure will be completed by this deadline; however, delays due to weather may occur and could postpone completion of closure. If closure cannot be completed by the deadline specified, GE will request an extension of the deadline as defined in 40 CFR 265.113(b).

CLOSURE COST ESTIMATE

The estimated cost for completion of closure activities at the GE facility is summarized in Table 5-2. The cost estimate reflects only the activities outlined in detail in this document.

FINANCIAL ASSURANCE MECHANISM FOR CLOSURE

GE will submit, under separate cover, the details of their financial assurance mechanism for closure.

CERTIFICATION OF CLOSURE

Closure and decontamination activities will be conducted under the supervision of an independent professional engineer registered in the state of Iowa. Upon completion of closure, GE will submit to the EPA Region VII a certification signed by the engineer and an authorized company official, per 40 CFR 265.115, that the container storage areas ("Big" Building, Outdoor Storage Rack Area and Safety Building) have been closed in accordance with the approved Closure Plan. The engineer will be responsible for providing the certification and necessary supporting documentation, including photographs.

TABLE 5-1

CLOSURE SCHEDULE

Time from EPA Region VII Approval (Weeks)	Activity
0-4	• 30-day notification to the Environmental Protection Agency (EPA), Region VII.
4-8	• Decontaminate the "Big" Building in accordance with Section 2.
	• Decontaminate the Outdoor Storage Rack Area and Safety Building in accordance with Section 3.
	• Collect and analyze water samples from each area.
	• Properly dispose of decontamination and rinse waters in accordance with analytical results.
8-14	• Develop Closure Certification.
14-18	• File Closure Certification with the EPA Region VII.

Note: Unforeseen delays due to weather, laboratory analysis or other relevant factors may occur and could delay completion of closure.

TABLE 5-2

CLOSURE COST ESTIMATE

Description	Cost
1. Engineering Oversight for Decontamination Including Concrete Surfaces	$ 6,650
2. Decontamination of Concrete Surfaces	$ 6,000
3. Sample Analysis (including duplicate and rinsate samples) a. Volatile Organics, 16 at $140 b. Lead, 14 at $25 c. Silver, 12 at $20 d. Cadmium, 12 at $25 e. Chromium, 12 at $20 f. Cyanide, 12 at $40	$ 3,850
4. Disposal of Waste Water (as hazardous waste) 18 Drums at $250 per Drum	$ 4,500
5. Develop Closure Certification	$ 7,500
TOTAL	**$28,500**

NOTICE TO LOCAL LAND AUTHORITY

Since it is the intent to clean close the areas listed in this Closure Plan, notice to the local land authority is not required.

SITE SAFETY

Site Safety Plans will be prepared by the certifying engineer, their subcontractors and GE personnel designated for closure activities. Site safety during closure activities will be conducted in accordance with pertinent Occupational Safety and Health Administration (OSHA) requirements to ensure the health and safety of workers.

AMENDMENTS TO THE CLOSURE PLAN

Should any significant revisions to the Closure Plan become necessary, it shall be amended in accordance with 40 CFR 265.112(c).

MONTGOMERY WATSON

CHAIN OF CUSTODY RECORD

Fed Ex. # _____

Cooler # _____

DESTINATION: MONTGOMERY LABORATORIES ☐

OTHER: _____ ☐

PROJECT NAME	PROJECT JOB #
SAMPLER(S): PRINTED NAME AND SIGNATURE	

TIME	DATE	LOCATION	IDENTIFIER	QA/OC	GRAB	COMP	NUMBER/SIZE OF CONTAINERS	ANALYSES REQUIRED										REMARKS

	SIGNATURE	PRINT NAME	COMPANY/TITLE	DATE	TIME
RELINQUISHED BY:					
RECEIVED BY:					
RELINQUISHED BY:					
RECEIVED BY:					
RELINQUISHED BY:					
RECEIVED BY:					

C-O-C No. ORIGINAL COPY: SEND WITH SAMPLE YELLOW COPY: RETAINED BY SAMPLER PINK: OFFICE COPY PAGE _____ OF _____

GE Switchgear Operation

General Electric Company
P.O. Box 488, Burlington, IA 52601
319 753-8400

September 21, 1994

Mr. Tony Petruska
RCRA Compliance Section
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, KS 66101

RE: RCRA Docket # VII-93-H-0014
Submittal of required Closure Plan and Financial Assurance for Closure

Dear Mr. Petruska:

Enclosed please find three copies of the Closure Plan for the GE facility in West Burlington, IA, which was prepared by Montgomery-Watson engineers. The plan addresses Closure for the "big" storage building and also for the small building and outside storage racks.

Also enclosed are three copies of the Financial Assurance documentation GE maintains for this facility.

Please call with any questions or comments.

Sincerely,

Terry A. Noteboom
Manager of Environment, Health and Safety

cc: Steve Angel
Sam Barbagiovanni
Jeff Sommer

Corporate Environmental Programs
General Electric Company
3135 Easton Turnpike, Fairfield, CT 06431

March 24, 1994

Re: Demonstration by General Electric Company of Financial Responsibility For Liability Coverage and Closure and/or Post-Closure Care for TSDF's

The attached information is being submitted by the General Electric Company to comply with the financial responsibility requirements relative to the Company's hazardous waste operations within your jurisdiction:

- Letter from the Chief Financial Officer, with wording for the financial test, including:

  Attachment listing affected facilities as specified in the Letter from the Chief Financial Officer; and;

  List of facilities, with explanations, whose closure and/or post-closure estimates differ from the inflation-adjusted estimates from last year, including facilities which no longer require financial assurance. Please note that we used an inflation factor of 2.6%, which was derived form the most recent Implicit Price Deflator for the GNP, available as of January 30, 1994. All estimates were rounded to the nearest thousand.

- Copy of General Electric Company's 1993 Annual Report which includes the independent public accountant's report on examination of financial statements for the latest completed fiscal year.

- Special report from KPMG - Peat Marwick Certified Public Accountants with respect to General Electric Company's financial information included in the Letter from the Chief Financial Officer.

- Copy of General Electric Company's 1993 Form 10K to the Securities and Exchange Commission.

If you have any questions about the information submitted, please contact Linda Moquet at (203) 373-3329.

Very truly yours,

Bruce R. Adler

Bruce R. Adler
Manager and Counsel - Environmental Operations

Corporate Environmental Programs
General Electric Company
[illegible] Fairfield, CT 06431

Letter From Chief Financial Officer

March 24, 1994

Administrator
U.S. EPA
Region VII
726 Minnesota Avenue
Kansas City, KS 66101

I am the chief financial officer of *the General Electric Company, 1 River Road, Schenectady, NY 12345.* This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage *"and closure and/or post-closure care"* as specified in subpart H of 40 CFR parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for *"both sudden and nonsudden"* accidental occurrences is being demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265:----*SEE SCHEDULE A*

The firm identified above guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, liability coverage for *"both sudden and nonsudden"* accidental occurrences at the following facilities owned or operated by the following: ----*SEE SCHEDULE A*. The firm identified above is *the direct or higher-tier parent corporation of the owner or operator.*

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care or liability coverage is demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimate covered by the test are shown for each facility: ---- *SEE SCHEDULE B*

2. The firm identified above guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, the closure and post-closure care or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for closure or post-closure care so guaranteed are shown for each facility: ---*SEE SCHEDULE B*

3. In States where EPA is not administering the financial requirements of subpart H of 40 CFR parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in subpart H or 40 CFR parts 264 and 265. The current closure or post-closure cost estimates covered by such a test are shown for each facility: ---- SEE SCHEDULE C

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in subpart H of 40 CFR parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: ---- *NONE*

5. This firm is the owner or operator or guarantor of the following UIC facilities for which financial assurance for plugging and abandonment is required under part 144 and is assured through a financial test. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:---- *NONE*

This firm *"is required"* to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on *December 31st*. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended *December 31, 1993.*

Part B. Closure or Post-Closure Care and Liability Coverage

Alternative II

	(Dollars in thousands)
1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	*$65,653*
2. Amount of annual aggregate liability coverage to be demonstrated	*$39,500*
3. Sum of lines 1 and 2	*$105,153*

4. Current bond rating of most recent issuance and name of rating service	*Aaa- Moody's AAA - Standard & Poors*
5. Date of issuance of bond	*9/25/92*
6. Date of maturity of bond	*9/01/95*
*7. Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities"on your financial statements you may add that portion to this line)	*$15,460,000*
*8. Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	*$219,903,000*
9. Is line 7 at least $10 million? (Yes/No)	*YES*
10. Is line 7 at least 6 times line 3? (Yes/No)	*YES*
*11. Are at least 90% of assets located in the U.S.? (Yes/No) If not, complete line 12.	*NO*
12. Is line 8 at least 6 times line 3? (Yes/No)	*YES*

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

Dennis D. Dammerman

Senior Vice President - Finance

March 24, 1994

OWNER/OPERATED FACILITIES

SCHEDULE A - LIABILITY

FISCAL YEAR ENDED DECEMBER 31, 1993

EPA ID#	FACILITY	STREET	CITY	ST	ZIP
ALD981026677	GE PLASTICS	1 PLASTICS DR.	BURKVILLE	AL	36752
CAD030584502	GE INDUSTRIAL & POWER SYS.-SERVICE	3601 E. LaPALMA AVE.	ANAHEIM	CA	92806
CAT000611095	GE ELECTRICAL DISTR. & CONTROLS	11115 VAN OWEN ST.	NORTH HOLLYWOOD	CA	91605
CAD009208075	GE INDUSTRIAL & POWER SYS.-SERVICE	5441 E. 14TH ST.	OAKLAND	CA	94601
CAD009542721	GEAE (TSDF + PERMIT BY RULE)	1923 E. AVION ST.	ONTARIO	CA	91761
CAD981375124	GEAE (PERMIT BY RULE)	2264 EAST AVION PLACE	ONTARIO	CA	91761
CAD001818541	GE PLASTICS (PERMIT BY RULE)	301 WOOLEY RD.	OXNARD	CA	93030
CAD053914206	GE INDUSTRIAL & POWER SYS.-NUCLEAR	P.O. 460	PLEASONTON	CA	94566
CTD001453711	GE	1285 BOSTON AVE.	BRIDGEPORT	CT	06601
CTD000842492	GE ELECTRICAL DISTR. & CONTROLS	41 WOODFORD AVE.	PLAINVILLE	CT	06062
GAD003308145	GE INDUSTRIAL & POWER SYS.-PDC	1935 REDHOWD CIRC.	ROME	GA	30161
IAD075836130	GE MOTORS	1803 RADIANT RD.	CARROLL	IA	51401
IAD005272703	GE ELECTRICAL DISTR. & CONTROLS	510 AGENCY RD.	W. BURLINGTON	IA	52655
IAD000678037	GE BURLINGTON BASKET COMPANY-PDC	1404-1418 W. PLEASANT ST.	W.BURLINGTON	IA	52655
ILD005453691	GE ELECTRICAL DISTR. & CONTROLS	1601 GE RD.	BLOOMINGTON	IL	61704
ILD070015714	GE INDUSTRIAL & POWER SYS.-SERVICE	6045 S. NOTTINGHAM	CHICAGO	IL	60638
ILD980503023	GE APPLIANCES	1540 S. 54TH AVE.	CICERO	IL	60650
ILD005443866	GE LIGHTING	1501 S. 19TH ST.	MATTOON	IL	61938
ILD005272992	GE MOTORS	709 W. WALL ST.	MORRISON	IL	61270
ILD079135133	GE CHEMICALS, INC.	CANAL RD.	OTTAWA	IL	61350
IND004557815	GE ELECTRICAL DISTR. & CONTROLS	1701 COLLEGE ST.	FORT WAYNE	IN	46802
IND006040299	GE MOTORS	12TH ST., SE., P.O. 657	LINTON	IN	47441
IND006376362	GE PLASTICS	LEXAN LN.	MT. VERNON	IN	47620
KSD041917501	GE AIRCRAFT ENGINES	STROTHER FIELD	ARKANSAS CITY	KS	67005
KYD006938395	GE KENTUCKY GLASS	903 RUSSELL CAVE PIKE	LEXINGTON	KY	40505
KYD006387021	GE APPLIANCES	APPLIANCE PK. 26-101	LOUISVILLE	KY	40225
KYD074047556	GE AIRCRAFT ENGINES	US. HWY. 41A, RTE. 2	MADISONVILLE	KY	42431
MDD046279311	GE APPLIANCES	9001 SNOWDEN RIVER PKWY.	COLUMBIA	MD	21046

OWNER/OPERATED FACILITIES

SCHEDULE A - LIABILITY

FISCAL YEAR ENDED DECEMBER 31, 1993

EPA ID#	FACILITY	STREET	CITY	ST	ZIP
MID050676622	GE INDUSTRIAL & POWER SYS.-SERVICE	18075 KRAUSE ST.	RIVERVIEW	MI	48192
NCD003237948	GE INDUSTRIAL & POWER SYS. - PDC	1223 FAIRGROVE CHURCH RD.	HICKORY	NC	28601
NCD050409150	GE INDUSTRIAL & POWER SYS.-NUCLEAR	CASTLE HAYNE RD. (M/C J26)	WILMINGTON	NC	28402
NYD093256063	GE INDUSTRIAL & POWER SYSTEMS - PD	381 BROADWAY	FORT EDWARD	NY	12828
NYD071094197	GE CORPORATE RESEARCH & DEVELOPMENT	P.O. 8 (BLDG. K-1, RM. 1A69)	SCHENECTADY	NY	12301
NYD002084135	GE INDUSTRIAL & POWER SYS.	1 RIVER RD., BLDG. 41-111	SCHENECTADY	NY	12345
NYD066832023	GE PLASTICS	NORYL AVE.	SELKIRK	NY	12158
NYD067539940	GE INDUSTRIAL & POWER SYS.-SERVICE	175 MILENS RD.	TONAWANDA	NY	14150
NYD002080034	GE PLASTICS	260 HUDSON RIVER RD.	WATERFORD	NY	12188
OHD000817312	GE AIRCRAFT ENGINES	1 NEUMANN WAY (M/D N123)	CINCINNATI	OH	45215
OHD074713561	GE INDUSTRIAL & POWER SYS.-SERVICE	156 CIRCLE FREEWAY DR.	CINCINNATI	OH	45246
OHD000817304	GE AIRCRAFT ENGINES	1350 TENNESSEE AVE.	CINCINNATI	OH	45229
OHD009101494	GE AIRCRAFT ENGINES	333 W. SEYMOUR AVE.	CINCINNATI	OH	45216
OHD048432975	GE LIGHTING	1133 E. 152ND ST.	CLEVELAND	OH	44110
OHD004302428	GE PLASTICS	1350 S. SECOND ST.	COSHOCTON	OH	43812
OHD004227369	GE LIGHTING	21800 TUNGSTEN RD.	EUCLID	OH	44117
OHD000721456	GE AIRCRAFT ENGINES	3024 SYMMES RD.	HAMILTON	OH	45215
OHD048111090	GE LIGHTING	85 W. ASTUBULA	JEFFERSON	OH	44047
OHD004176046	GE LIGHTING	403 N. MAIN ST.	NILES	OH	44446
OHD059061317	GE LIGHTING	6800 N. CHESTNUT ST.	RAVENNA	OH	44266
OHD004224960	GE LIGHTING	1313 W. MARKET ST.	WARREN	OH	44485
OHD004226171	GE LIGHTING	40 HUGHES ST.	YOUNGSTOWN	OH	45027
PAD060682622	GE LIGHTING	MAYER ST.	BRIDGEVILLE	PA	15017
PAD005033055	GE TRANSPORTATION SYSTEMS	2901 E. LAKE RD., BLDG. 13-2	ERIE	PA	16531
PAD059290908	GE TRANSPORTATION SYSTEMS	INDUSTRIAL DR.	GROVE CITY	PA	16127
PAD003026903	GE PROPERTY	NEW HOLLAND AVE.	LANCASTER	PA	17604
SCD067002147	GE MEDICAL SYSTEMS	3001 W. RADIO DR.	FLORENCE	SC	29501
SCD049126907	GE INDUSTRIAL & POWER SYSTEMS	300 GARLINGTON RD.	GREENVILLE	SC	29607
TXD064114242	GE INDUSTRIAL & POWER SYS.-SERVICE	3202 MANOR WAY	DALLAS	TX	75235
TXD060718269	GE INDUSTRIAL & POWER SYS.-SERVICE	8800 WALLISVILLE RD.	HOUSTON	TX	77029
VAD070360219	GE LIGHTING	RTE. 3, P.O. 310	WINCHESTER	VA	22601
VTD001075894	GE AIRCRAFT ENGINES	16 WINDCREST RD.	N. CLARENDON	VT	05759

OWNER/OPERATED FACILITIES

SCHEDULE A - LIABILITY

FISCAL YEAR ENDED DECEMBER 31, 1993

EPA ID#	FACILITY	STREET	CITY	ST	ZIP
WAD009278706	GE AIRCRAFT ENGINES	220 S. DAWSON ST.	SEATTLE	WA	98108
WID086686003	GE MEDICAL SYSTEMS	4855 W. ELECTRIC AVE.	MILWAUKEE	WI	53219
WID980683569	GE MEDICAL SYSTEMS	3114 N. GRANDVIEW BLVD.	WAUKESHA	WI	53188
WID006121347	GE APPLIANCES	2205 S. 43RD ST.	WEST MILWAUKEE	WI	53219
WVD980552384	GE PLASTICS	1000 DUPONT RD., BLDG. 816	MORGANTOWN	WV	26505
WVD088911854	GE PLASTICS	STATE RTE. 892, P.O. 68	WASHINGTON	WV	26181
PAD060682622	GE LIGHTING - CORRECTIVE ACTION	BRIDGEVILLE, PA 15017	EPA REGION 3	xx	

TOTAL FACILITIES: 67

GUARANTEED FACILITIES

SCHEDULE A - LIABILITY

FISCAL YEAR ENDED DECEMBER 31, 1993

EPA ID#	FACILITY	STREET	CITY	ST	ZIP
MSD000742668	GESHAN	PORT BIENVILLE IND. PK.	BAY ST. LOUIS	MS	39521
PRD090383860	GE ELECTRICAL DISTR. & CONTROLS	ZENO GANDIA PK., RTE. 120	ARECIBO	PR	00613
PRD090070459	GE ELECTRICAL DISTR. & CONTROLS	STATE RD. 3, KM. 82.0; POB 9069	HUMACAO	PR	00661
PRD090282757	GE LIGHTING	CARRION MADMUD URO FINAL; POB 1430	JUAN DIAZ	PR	00665
PRD090510793	GE ELECTRICAL DISTR. & CONTROLS	P.O. 377	PALMER	PR	00721
PRD090492109	GE ELECTRICAL DISTR. & CONTROLS	STATE RD. #3 KM 122.9	PATILAS	PR	00723
PRD000692590	GE INDUSTRIAL & POWER SYS.	CALLE LA BRISA #5 SABANA LLANA	RIO PIEDRAS	PR	00924
PRD091019224	GE ELECTRICAL DISTR. & CONTROLS	EL "RETIRO" INDUSTRIAL PK.	SAN GERMAN	PR	00753
PRD000692582	GE INDUSTRIAL & POWER SYS.	P.O. 187	VIEQUES	PR	00765
TXD061382206	GE RAILCAR REPAIR SERVICES CORP.	P.O. 115, TIFFON RD.	RANGER	TX	76470
VAD980551782	GE FANUC AUTOMATION N. AMERICA INC.	RTE. 29 N. AT RTE. 606	CHARLOTTESVILLE	VA	22901

TOTAL FACILITIES: 11

GUARANTEED FACILITIES

SCHEDULE A - LIABILITY

FISCAL YEAR ENDED DECEMBER 31, 1993

EPA ID#	FACILITY	STREET	CITY	ST	ZIP

TOTAL FACILITIES: 78

OWNER/OPERATED FACILITIES

SCHEDULE B - CLOSURE/POST CLOSURE (WHERE EPA IS ADMINISTERING)
FISCAL YEAR ENDED DECEMBER 31, 1993

03-24-1994
PAGE: 1

EPA ID#	FACILITY	STREET	CITY	ST	CLOSURE	POST CLOS.	TOTAL
IAD075836130	GE MOTORS	1803 RADIANT RD.	CARROLL	IA	12,178	0	12,178
IAD005272703	GE ELECTRICAL DISTR. & CONTR	510 AGENCY RD.	W. BURLINGTO	IA	487,052	24,354	511,406
IAD000678037	GE BURLINGTON BASKET COMPANY	1404-1418 W. PLEASANT ST.	W.BURLINGTON	IA	205,208	941,789	1,146,997
	TOTAL STATE FACILITIES: 3		STATE TOTAL:		704,438	966,143	1,670,581
PAD060682622	GE LIGHTING - CORRECTIVE ACT	BRIDGEVILLE, PA 15017	EPA REGION 3	XX	3,500,000	0	3,500,000
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		3,500,000	0	3,500,000
	TOTAL	: 4	TOTAL:		4,204,438	966,143	5,170,581

OWNER/OPERATED FACILITIES

SCHEDULE B - CLOSURE/POST CLOSURE (WHERE EPA IS ADMINISTERING)
FISCAL YEAR ENDED DECEMBER 31, 1993

03-24-1994
PAGE: 2

EPA ID#	FACILITY	STREET	CITY	ST	CLOSURE	POST CLOS.	TOTAL
TOTAL ALL FACILITIES: 4			SUM OF ALL C/PC ESTIMATES:		4,204,438	966,143	5,170,581

OWNER/OPERATED FACILITIES

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)
FISCAL YEAR ENDED DECEMBER 31, 1993

03-24-1994

EPA ID#	FACILITY	STREET	CITY	ST	CLOSURE	POST CLOS.	TOTAL
ALD981026677	GE PLASTICS	1 PLASTICS DR.	BURKVILLE	AL	61,083	0	61,083
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		61,083	0	61,083
CAD030584502	GE INDUSTRIAL & POWER SYS.-S	3601 E. LaPALMA AVE.	ANAHEIM	CA	71,820	0	71,820
CAT000611095	GE ELECTRICAL DISTR. & CONTR	11115 VAN OWEN ST.	NORTH HOLLYW	CA	59,028	0	59,028
CAD009208075	GE INDUSTRIAL & POWER SYS.-S	5441 E. 14TH ST.	OAKLAND	CA	35,416	0	35,416
CAD009542721	GEAE (TSDF - PERMIT BY RULE)	1923 E. AVION ST.	ONTARIO	CA	297,522	308,518	606,040
CAD981375124	GEAE (PERMIT BY RULE)	2264 EAST AVION PLACE	ONTARIO	CA	28,728	0	28,728
CAD001818541	GE PLASTICS (PERMIT BY RULE)	301 WOOLEY RD.	OXNARD	CA	52,634	0	52,634
CAD053914206	GE INDUSTRIAL & POWER SYS.-N	P.O. 460	PLEASONTON	CA	174,758	9,463	184,221
	TOTAL STATE FACILITIES: 7		STATE TOTAL:		719,906	317,981	1,037,887
CTD001453711	GE	1285 BOSTON AVE.	BRIDGEPORT	CT	871,030	696,360	1,567,390
CTD000842492	GE ELECTRICAL DISTR. & CONTR	41 WOODFORD AVE.	PLAINVILLE	CT	648,028	1,662,685	2,310,713
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		1,519,058	2,359,045	3,878,103
GAD003308145	GE INDUSTRIAL & POWER SYS.-P	1935 REDMOND CIRC.	ROME	GA	266,015	0	266,015
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		266,015	0	266,015
ILD005453691	GE ELECTRICAL DISTR. & CONTR	1601 GE RD.	BLOOMINGTON	IL	104,289	0	104,289
ILD070015714	GE INDUSTRIAL & POWER SYS.-S	6045 S. NOTTINGHAM	CHICAGO	IL	130,000	0	130,000
ILD980503023	GE APPLIANCES	1540 S. 54TH AVE.	CICERO	IL	0	0	0
ILD005443866	GE LIGHTING	1501 S. 19TH ST.	MATTOON	IL	26,260	0	26,260
ILD005272992	GE MOTORS	709 W. WALL ST.	MORRISON	IL	250,000	0	250,000
ILD079135133	GE CHEMICALS, INC.	CANAL RD.	OTTAWA	IL	99,215	0	99,215
	TOTAL STATE FACILITIES: 6		STATE TOTAL:		609,764	0	609,764
IND004537815	GE ELECTRICAL DISTR. & CONTR	1701 COLLEGE ST.	FORT WAYNE	IN	53,128	0	53,128
IND006040299	GE MOTORS	12TH ST., SE., P.O. 657	LINTON	IN	61,792	0	61,792
IND006376362	GE PLASTICS	LEXAN LN.	MT. VERNON	IN	1,947,163	0	1,947,163
	TOTAL STATE FACILITIES: 3		STATE TOTAL:		2,062,083	0	2,062,083
KSD041917501	GE AIRCRAFT ENGINES	STROTHER FIELD	ARKANSAS CIT	KS	32,153	0	32,153
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		32,153	0	32,153
KYD006938395	GE KENTUCKY GLASS	903 RUSSELL CAVE PIKE	LEXINGTON	KY	128,250	0	128,250
KYD006387021	GE APPLIANCES	APPLIANCE PK. 26-101	LOUISVILLE	KY	0	0	0
KYD074047556	GE AIRCRAFT ENGINES	US. HWY. 41A, RTE. 2	MADISONVILLE	KY	219,821	0	219,821
	TOTAL STATE FACILITIES: 3		STATE TOTAL:		348,071	0	348,071
MDD046279311	GE APPLIANCES	9001 SNOWDEN RIVER PKWY.	COLUMBIA	MD	0	0	0

OWNER/OPERATED FACILITIES

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)
FISCAL YEAR ENDED DECEMBER 31, 1993

EPA ID#	FACILITY	STREET	CITY	ST	CLOSURE	POST CLOS.	TOTAL
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		0	0	0
NCD003237948	GE INDUSTRIAL & POWER SYS. -	1223 FAIRGROVE CHURCH RD.	HICKORY	NC	37,963	5,944,475	5,982,438
NCD050409150	GE INDUSTRIAL & POWER SYS.-N	CASTLE HAYNE RD. (M/C J26)	WILMINGTON	NC	208,275	0	208,275
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		246,238	5,944,475	6,190,713
NYD093256063	GE INDUSTRIAL & POWER SYSTEM	381 BROADWAY	FORT EDWARD	NY	597,735	0	597,735
NYD071094197	GE CORPORATE RESEARCH & DEVE	P.O. 8 (BLDG. K-1, RM. 1A69	SCHENECTADY	NY	768,947	0	768,947
NYD002084135	GE INDUSTRIAL & POWER SYS.	1 RIVER RD., BLDG. 41-111	SCHENECTADY	NY	1,848,678	0	1,848,678
NYD066832023	GE PLASTICS	NORYL AVE.	SELKIRK	NY	1,437,691	136,988	1,574,679
NYD067539940	GE INDUSTRIAL & POWER SYS.-S	175 MILENS RD.	TONAWANDA	NY	359,464	0	359,464
NYD002080034	GE PLASTICS	260 HUDSON RIVER RD.	WATERFORD	NY	11,513,940	86,047	11,599,987
	TOTAL STATE FACILITIES: 6		STATE TOTAL:		16,526,455	223,035	16,749,490
SCD067002147	GE MEDICAL SYSTEMS	3001 W. RADIO DR.	FLORENCE	SC	165,175	1,406,045	1,571,220
SCD049126907	GE INDUSTRIAL & POWER SYSTEM	300 GARLINGTON RD.	GREENVILLE	SC	7,230,625	6,170,797	13,401,422
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		7,395,800	7,576,842	14,972,642
TXD064114242	GE INDUSTRIAL & POWER SYS.-S	3202 MANOR WAY	DALLAS	TX	12,177	0	12,177
TXD060718269	GE INDUSTRIAL & POWER SYS.-S	8800 WALLISVILLE RD.	HOUSTON	TX	1,613,588	0	1,613,588
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		1,625,765	0	1,625,765
VAD070360219	GE LIGHTING	RTE. 3, P.O. 310	WINCHESTER	VA	69,178	0	69,178
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		69,178	0	69,178
VTD001075894	GE AIRCRAFT ENGINES	16 WINDCREST RD.	N. CLARENDON	VT	0	973,725	973,725
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		0	973,725	973,725
WAD009278706	GE AIRCRAFT ENGINES	220 S. DAWSON ST.	SEATTLE	WA	41,087	0	41,087
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		41,087	0	41,087
WVD980552384	GE PLASTICS	1000 DUPONT RD., BLDG. 816	MORGANTOWN	WV	176,163	0	176,163
WVD088911854	GE PLASTICS	STATE RTE. 892, P.O. 68	WASHINGTON	WV	704,240	120,952	825,192
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		880,403	120,952	1,001,355
	TOTAL : Facilities: 42		TOTAL:		32,403,059	17,516,055	49,919,114

GUARANTEED FACILITIES

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)
FISCAL YEAR ENDED DECEMBER 31, 1993

EPA ID#	FACILITY	STREET	CITY	ST	CLOSURE	POST CLOS.	TOTAL
MSD000742668	GESHAN	PORT BIENVILLE IND. PK.	BAY ST. LOUI	MS	318,830	0	318,830
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		318,830	0	318,830
PRD090383860	GE ELECTRICAL DISTR. & CONTR	ZENO GANDIA PK., RTE. 120	ARECIBO	PR	135,763	0	135,763
PRD090070459	GE ELECTRICAL DISTR. & CONTR	STATE RD. 3, KM. 82.0; POB	HUMACAO	PR	0	0	0
PRD090282757	GE LIGHTING	CARRION MADHUD URO FINAL; P	JUAN DIAZ	PR	1,207,000	0	1,207,000
PRD090510793	GE ELECTRICAL DISTR. & CONTR	P.O. 377	PALMER	PR	974,103	0	974,103
PRD090492109	GE ELECTRICAL DISTR. & CONTR	STATE RD. #3 KM 122.9	PATILAS	PR	2,186,854	0	2,186,854
PRD000692590	GE INDUSTRIAL & POWER SYS.	CALLE LA BRISA #5 SABANA LL	RIO PIEDRAS	PR	0	0	0
PRD091019224	GE ELECTRICAL DISTR. & CONTR	EL "RETIRO" INDUSTRIAL PK.	SAN GERMAN	PR	47,399	0	47,399
PRD000692582	GE INDUSTRIAL & POWER SYS.	P.O. 187	VIEQUES	PR	567,564	0	567,564
	TOTAL STATE FACILITIES: 8		STATE TOTAL:		5,118,683	0	5,118,683
TXD061382206	GE RAILCAR REPAIR SERVICES C	P.O. 115, TIFFOW RD.	RANGER	TX	0	1,420,562	1,420,562
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		0	1,420,562	1,420,562
VAD980551782	GE FANUC AUTOMATION N. AMERI	RTE. 29 N. AT RTE. 606	CHARLOTTESVI	VA	207,377	238,957	446,334
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		207,377	238,957	446,334
	TOTAL : Facilities: 11		TOTAL:		5,644,890	1,659,519	7,304,409

GUARANTEED FACILITIES

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)
FISCAL YEAR ENDED DECEMBER 31, 1993

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EPA ID#	FACILITY	STREET	CITY	ST	CLOSURE	POST CLOS.	TOTAL
TOTAL ALL FACILITIES: 53			SUM OF ALL C/PC ESTIMATES:		38,047,949	19,175,574	57,223,523

EXPLANATIONS - ESTIMATES "CHANGED" FROM LAST YEAR
(i.e., not adjusted according to the inflation factor)

FISCAL YEAR ENDED DECEMBER 31, 1993

EPA #ID	FACILITY	CLOSURE	POST CLO.	EXPLANATION
CTD001453711	RESD	871,030	696,360	INCREASED -- AMENDED CLOSURE PLAN
ILD070015714	GEIPS	130,000	0	INCREASED -- IN THE PROCESS OF CLOSING
ILD005272992	GEM	250,000	0	INCREASED -- CLOSURE TECHNOLOGY REVISED AND PARTIAL CLOSURE COMPLETED
IND000803726	GEAPPL	0	0	RELEASED -- PER 10/12/93 LETTER FROM INDIANA DEPT. ENV. MGMT.
IND006376362	GEP	1,947,163	0	INCREASED -- TO INCLUDE ESTIMATED COST OF TWO BOILER CLOSURES
KYD006938395	GEL	128,250	0	RE: CONSENT ORDER #DWM 99228 - COMMONWEALTH OF KENTUCKY (8/30/93)
LAD053782413	GEIPS	0	0	GENERATOR STATUS - RELEASE LETTER FROM STATE DATED 2/14/94
NCD050409150	GEIPS	208,275	0	INCREASED -- UPDATED PRICING FOR MATERIAL AND LABOR
NYD066832023	GEP	1,437,691	136,988	INCREASED-- COSTS LANDFILL REMEDIATION; CLOSED -- FBI 1993
NYD059385120	GEA	0	0	DROPPED -- SOLD TO MARTIN MARIETTA
NYD002080034	GEP	11,513,940	86,047	INCREASED -- RCRA (NYS PART 373) RENEWAL
OHD074713561	GEIPS	0	0	DROPPED - FINANCIAL ASSURANCE NO LONGER REQUIRED PER OHIO EPA 3/25/93 LETTER
OHD004302428	GEP	1,416,503	100,000	INCREASED -- ONSITE LANDFILL "ROD" + POST CLOSURE
OHD004176046	GEL	0	0	9/17/90 GENERATOR STATUS APPROVED - NEED RELEASE FROM FINANCIAL ASSURANCE
OHD066052804	GEL	0	0	CERTIFIED CLOSED - OHIO EPA LETTER DATED 10/18/93
OHD059061317	GEL	0	0	CERTIFIED CLOSED -- OHIO EPA LETTER DATED 4/2/93
OHD048111090	GEL	800,000	0	INCREASED -- SCOPE EXPANDED - GROUNDWATER REMEDIATION SYSTEM INSTALLATION 1994
OHD004226171	GEL	0	0	CLOSED IN 1989 -- PENDING RELEASE FROM FINANCIAL ASSURANCE
PAD059290908	GETS	0	0	CLOSURE CERTIFICATION ACCEPTED -- NEED RELEASE FROM FURTHER FINANCIAL ASSURANCE
PAD060682622	GEL	3,500,000	0	INCREASED -- COSTS ASSOCIATED TO CLOSE LANDFILL
PRD090282757	GEL	1,207,000	0	1988 RCRA UNIT CLOSED & PENDING RELEASE. INCREASE - CERCLA LANDFILL CLOSURE
PRD000692590	GEIPS	0	0	NEED RELEASE FROM FINANCIAL ASSURANCE--CLOSURE CERTIFICATION ACCEPTED 1/28/91
TXD061382206	GEFS	0	1,420,562	DECREASED -- FINAL POST CLOSURE PERMIT AND COMPLIANCE PLAN ISSUED 3/17 BY STATE
VTD002083434	GEA	0	0	DROPPED -- SOLD TO MARTIN MARIETTA

TOTAL: 24

KPMG Peat Marwick

Certified Public Accountants

Stamford Square
3001 Summer Street
Stamford, CT 06905

The Board of Directors
General Electric Company:

We have applied certain agreed-upon procedures, as discussed below, to selected financial information included in "Part B. Closure or Post-Closure Care and Liability Coverage - Alternative II" of your letter dated March 24, 1994 to the United States Environmental Protection Agency. Our procedures were performed solely to assist you in connection with the filing of the aforementioned letter and our report is not to be used for any other purpose. Our procedures and findings are as follows:

- Tangible Net Worth - We compared the dollar amount of tangible net worth ($15,460,000 thousand), as shown in Item 7, to the difference between Total Share Owners' Equity ($25,824,000 thousand) and Intangible Assets ($10,364,000 thousand) each reflected in the Statement of Financial Position on page 28 of the Company's 1993 Annual Report, and found such amounts to be in agreement.

- Total Assets in the United States - We compared the Company's Total Assets in the United States ($219,903,000 thousand), as shown in Item 8, to the Company's Total Assets in the United States reflected in Note 30 - Geographic Segment Information on page 62 of the Company's 1993 Annual Report, and found such amounts to be in agreement.

- Are at Least 90% of Assets Located in the United States? - We divided the Company's Total Assets in the United States ($219,903,000 thousand) reflected in Note 30 - Geographic Segment Information on page 62 of the Company's 1993 Annual Report by the Company's Total Assets ($251,506,000 thousand) reflected in the Statement of Financial Position on page 28 of the Company's 1993 Annual Report, and found that the Company's Total Assets in the United States were less than 90% of the Company's Total Assets. Accordingly, we agree with the Company's response of "No" in Item 11.

Because the above procedures do not constitute an audit made in accordance with generally accepted auditing standards, we express no opinion on any of the items referred to above. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the items should be adjusted. Had we performed additional procedures, matters might have come to our attention that would have been reported to you. This report relates only to the items specified above and does not extend to any financial statements of General Electric Company and consolidated affiliates taken as a whole.

March 24, 1994

KPMG Peat Marwick